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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF LAURA L. GOODMAN  
IN SUPPORT OF REORGANIZED  
DEBTORS' OBJECTION TO PROOF OF  
CLAIM NO. 58562 FILED BY FULCRUM  
CREDIT PARTNERS LLC AS TRANSFEREE  
OF TUSCAN RIDGE ASSOCIATES, LLC**

**Response Deadline:  
October 26, 2021, 4:00 p.m. (Pacific Time)**

**Hearing Information If Timely Response Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Laura L. Goodman hereby declare:

2 I am an attorney at law licensed to practice in the State of California and admitted to the bar of  
3 this Court. I am an attorney with Gough & Hancock LLP, counsel for Debtors herein. I make this  
4 Declaration in support of the *Reorganized Debtors' Objection to Proof of Claim No. 58562 filed by*  
5 *Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC*, filed  
6 contemporaneously herewith. Unless stated otherwise, I have personal knowledge of the matters set  
7 forth herein:

8 1. Attached for the Court's convenience as **Exhibit A** is a true and correct copy of the  
9 Proof of Claim filed by Tuscan Ridge Associates with Attachments 1-3.

10 2. Attached as **Exhibit B** is a true and correct copy of the November 20, 2018 Letter  
11 Agreement between Tuscan Ridge Associates, LLC and Pacific Gas & Electric Company as attached  
12 to the Proof of Claim.

13 3. Attached hereto as **Exhibit C** is a true and correct filed-stamped copy of a March 5,  
14 2020 verified Complaint for Breach of Contract, For Breach of the Implied Covenant of Good Faith  
15 and Fair Dealing; Petition to Compel filed by Tuscan Ridge Associates, Inc. against ECC Constructors,  
16 LLC that I retrieved from the Butte County Superior Court online portal. The verification is signed by  
17 Scott Bates as Managing Member for Tuscan Ridge Associates, Inc.

18 4. Attached hereto as **Exhibit D** is a true and correct filed-stamped copy of a March 9,  
19 2020 Errata to Complaint filed by Tuscan Ridge Associates Inc. against ECC Constructors, LLC with  
20 Exhibits A-D that I retrieved from the Butte County Superior Court online portal. The highlighting on  
21 Exhibit C is on the copy of this document as retrieved from the Butte County Superior Court online  
22 portal and not my own.

23 5. Attached hereto as **Exhibit E** is a true and correct filed-stamped copy of a March 11,  
24 2020 Declaration of Scott Bates in Support of Ex Parte Application for Writ of Attachment that I  
25 retrieved from the Butte County Superior Court online portal.

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1 I declare under penalty of perjury and in accordance with laws of the United States of America  
2 that the foregoing is true and correct.

3 Dated: September 22, 2021

/s/ Laura L. Goodman  
Laura L. Goodman